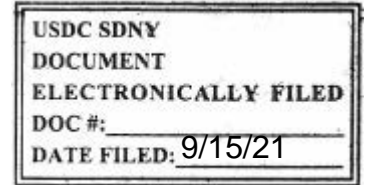


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



LRN CORPORATION,

Plaintiff,

vs.

MARKEL INSURANCE COMPANY and
ARCH INSURANCE COMPANY,

Defendants.

No. 1:20-cv-08431-AJN-GWG

**STIPULATION OF DISMISSAL
WITH PREJUDICE AS TO
DEFENDANT ARCH INSURANCE
COMPANY ONLY AND
PROPOSED ORDER**

Plaintiff LRN Corporation ("LRN"), by counsel, and Defendant Arch Insurance Company ("Arch"), by counsel, hereby stipulate and agree that all matters herein between them have been compromised, settled and memorialized in a confidential Settlement Agreement, and that LRN's cause of action against Arch only should be dismissed, with prejudice, with each party to bear its own costs and attorneys' fees.

Respectfully submitted,

REED SMITH LLP

A handwritten signature in black ink, appearing to read "J. N. Ellison".

Dated: September 15, 2021

John N. Ellison
599 Lexington Avenue
New York, NY 10022
T: (212) 521-5400
jellison@reedsmith.com


David M. Halbreich
Margaret C. McDonald
355 South Grand Avenue
Suite 2900
Los Angeles, CA 90071

T: (213) 457-8000
dhalbreich@reedsmith.com
mcmcdonald@reedsmith.com

Lisa A. Szymanski
Three Logan Square
1717 Arch Street, Suite 300
Philadelphia, PA 19103
T: (215) 851-8100
lszymanski@reedsmith.com

Counsel for Plaintiff LRN Corporation

Dated: September 15, 2021



Peter J. Scoolidge
**SCOOLIDGE PETERS RUSSOTTI
& FOX, LLP**

2 Park Avenue, 19th Floor
New York, NY 10016
T: (212) 729-7708
peter@sprfllp.com



Michael R. Goodstein
BAILEY CAVALIERI LLC
10 W. Broad Street, Suite 2100
Columbus, OH 43215
T: (614) 229-3231
mgoodstein@baileycav.com

Counsel for Defendant Arch Insurance Co.

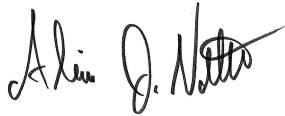
~~PROPOSED~~ ORDER APPROVING
STIPULATION OF DISMISSAL WITH PREJUDICE AS TO DEFENDANT ARCH
INSURANCE COMPANY ONLY

DONE AND ORDERED in New York, New York, this 15th day of Sept., 2021.

THE HONORABLE Alison J. Nathan

Copies furnished:
All counsel of record

SO ORDERED:



9/15/21

J.

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused the foregoing to be filed electronically using the Court's ECF System, which will send notification of such filing on all counsel of record:

Michael Delhagen, Esq.
Jennifer Zaluski, Esq.
Tressler LLP
One Penn Plaza, Suite 4701
New York, New York 10119
mdelhagen@tresslerllp.com
jzaluski@tresslerllp.com

Daniel Formeller, Esq.
Tressler LLP
233 S. Wacker Dr.
61st Floor
Chicago, IL 60606
dformeller@tresslerllp.com

Counsel for Defendant Markel Insurance Company

Michael Goodstein, Esq.
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, OH 43215
mgoodstein@baileycav.com

Peter Scoolidge, Esq.
Scoolidge, Peters, Russotti & Fox, LLP
2 Park Avenue - 19th Floor
New York, NY 10016
peter@sprflp.com

Counsel for Defendant Arch Insurance Company

Dated: September 15, 2021

s/ John N. Ellison
John N. Ellison
Counsel for Plaintiff LRN Corporation